

RECEIVED  
IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
3:02

DECLAR. HALL SET. CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

2005-08-02

Michael D. Anderson et al.

Full name and prison number of  
plaintiff(s)

v.

Donald Campbell, Commissioner

Arnold Holt, Warden et al.

L. Boyd, Asst. Warden et al.

S. Nettles, Captain et al.

Name of person(s) who violated  
your constitutional rights.

(List the names of all the persons) - - )

CIVIL ACTION NO. 2:05CV719-A  
(To be supplied by the Clerk of the  
U.S. District Court)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? Yes ( ) No (X)

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? Yes ( ) No (X)

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit  
Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket No. \_\_\_\_\_

4. Name of Judge to whom case was assigned \_\_\_\_\_

Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) N/A

6. Approximate date of filing lawsuit N/A

7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Bullock County Core Facility,  
P.O. Box 5107, Union Springs, Alabama - 36089

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bullock County  
Core Facility, P.O. Box 5107, Union Springs, AL - 36089

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. Donald Campbell, P.O. Box 301501, Monte Leno, AL - 36132

2. Arnold Holt, P.O. Box 5107, Union Springs, AL - 36089

3. L. Boyd, P.O. Box 5107, Union Springs, AL - 36089

4. S. Nettles, P.O. Box 5107, Union Springs, AL - 36089

5. Edna Johnson, P.O. Box 5107, Union Springs, AL - 36089

6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED VARIOUS

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: SEE ATTACHED SHEETS

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place, manner, and person involved).

SEE ATTACHED SHEETS

GROUND TWO: SEE ATTACHED SHEETS

SUPPORTING FACTS: SEE ATTACHED SHEETS

GROUND THREE: SEE ATTACHED SHEETS

SUPPORTING FACTS: SEE ATTACHED SHEETS

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

SEE ATTACHED SHEETS

Michael W. Anderson  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on AUGUST 1<sup>ST</sup> 2005  
(date)

Michael W. Anderson  
Signature of plaintiff(s)

IN THE UNITED STATES Middle District Court, Alabama

MICHAEL D. ANDERSON, ET AL.,  
PETITIONER,

VS.

DONALD CAMPBELL, COMMISSIONER,  
ARNOLD HOLT, WARDEN,  
LOUIS BOYD, ASST. WARDEN  
S. NETTLES, CAPTAIN  
(CO-1'S WILL BE INCLUDED LATER) ET AL.,

CASE No.                     

Civil Action

Jurisdiction:

THIS HONORABLE COURT HAS JURISDICTION OVER THE ABOVE  
STYLED ACTION PURSUANT TO §1483, WHERE CONSTITUTIONAL  
VIOLATIONS, LAWS, AND TREATIES ARE IN CONFLICT;

COMES NOW THE PETITIONER MICHAEL D. ANDERSON, AND BEINGS  
THIS CIVIL ACTION AGAINST THE AUTHORITIES OF THE BULLOCK  
COUNTY CORRECTIONAL FACILITY, P.O. BOX 5107, UNION SPRINGS,  
ALABAMA-36089. COMMISSIONER DONALD CAMPBELL, (RESPONDENT  
SUPERIOR), P.O. BOX 301501, MONTGOMERY, ALABAMA-36130.

THE FACTS STIPULATED WITHIN THIS PETITION WILL SHOW  
THE NEGLIGENCE AND CONSTITUTIONAL VIOLATIONS THAT THESE  
OFFICIALS HAVE VIOLATED, WHICH THEY ARE PAID AND ENTRUSTED  
TO HANDLE UNDER THE LAWS AND CONSTITUTIONS OF THE UNITED

STATES CONSTITUTION. PETITIONER SHOWS THE FOLLOWING FOR  
PLACING THIS ACTION BEFORE THIS HONORABLE COURT:

(1) 90% PERCENT OF THIS FACILITY IS FAMILY AND CLOSE RELATED  
FRIENDS OF THE ASSISTANT WARDEN AND CAPTAIN, AND THEIR  
VICIOUS ABUSE OF AUTHORITY IS OVER-LOOKED. THE OFFICER'S  
MAY ASSAULT AN INMATE, TAKE THEIR PROPERTY, AND GIVE A  
BEHAVIOR CITATION OR DISCIPLINARY FOR ANY WILDING REASON,  
AND NOTHING IS DONE ABOUT IT. THERE ARE MANY INMATES  
THAT HAS BEEN ASSAULTED BY OFFICERS, JUST BECAUSE THEY  
CHOOSE TO DO SO, AND HAS TO AGREE TO A WRITE UP TO GET OUT  
LOCK-UP WITHOUT PROPER INVESTIGATION FROM THE SENIOR  
OFFICER'S OF THIS FACILITY. THE WARDEN, ASSISTANT WARDEN,  
CAPTAINS, AND OTHERS, ARE AWARE OF THESE EVENTS AND  
ACCURANCE'S TAKING PLACE, AND NOTHING NEVER SEEMS  
TO COME OUT OF IT PROPERLY. THERE'S A NEED FOR A THOROUGH  
INVESTIGATION OF THE RECORDS OF ASSAULTS AND WRITE-UPS  
IN THIS FACILITY, THAT THE TRUTH MAY PREVAIL.

(2) THIS FACILITY IS NOT EQUIPPED WITH AN OUTSIDE TOILET  
FACILITY FOR USE WHEN ORDERED ON THE YARD EVERY MORNING,  
AND ONLY (1) TOILET IN THE GYM AREA, IF THE DOORS ARE  
OPENED FOR USE. FEDERAL LAWS REQUIRE THAT AN OUTSIDE  
TOILET BE PLACED AT A PRISON FACILITY FOR USEABLE, ESPECIALLY,  
WHEN INMATES ARE ORDERED ON THE OUTSIDE YARD FOR  
HOURS AT A TIME. AND THERE'S ONLY ONE (1) WATER FACET  
FOR HUNDREDS OF INMATES TO DRINK FROM, WHILE ORDERED  
TO THE OUTSIDE YARD.

(3) INMATES ARE CONSTANTLY UNDER PRESSURE AND SHAKEDOWNS OF THEIR PROPERTIES, AND CONFISCATED TO BE GIVEN TO PRISON OFFICERS FOR THEIR PERSONAL USE. OFFICERS SEIZE PRODUCTS FROM SOME INMATES TO PAY OFF THEIR PRISON SWITCHES FOR INFORMATION, AND THIS INFORMATION DOES NOT HAVE TO BE THE TRUTH. VINCE MOFFAT, (JOHN DOE) FOR THE TIME BEING IN THIS PETITION, IS GIVEN THE HIGHEST REWARDS IN THIS FACILITY, AND INMATES ARE DEALT WITH HARSHLY FOR CONFRONTING HIM ABOUT ANY OF HIS SWITCH ACTIVITY. MOFFAT (JOHN DOE) CAN SMOKE CIGARS WITH THE OFFICERS, CARRY HIS OWN LIGHTER WITH OFFICERS PERMISSION, ORDER DINNERS FROM THE FREE WORLD, AND DO INVESTIGATIONS FOR OFFICERS, AND ISSUE ERRONEOUS INFORMATION FOR PAY FROM OFFICERS. THIS IS TOO MUCH POWER FOR AN INMATE IN PRISON, BECAUSE THIS INMATE WOULD GOES FURTHER THAN MOST OFFICERS AT THIS FACILITY. THE SENIOR OFFICERS ARE AWARE OF ALL THESE THINGS NONE HAS DONE ANYTHING TO DISSOLVE THIS TYPE BEHAVIOR.

(4) THIS PRISON FACILITY PROMOTES AND ENCOURAGES HOMO-SEXUAL ACTIVITIES OF THE INMATES BUT PROHIBITS A MAN FROM PUTTING HIS ARMS AROUND HIS FEMALE VISITOR, OR EVEN HOLDING THEIR HANDS DURING VISITATION. OFFICERS DO NOT PROMOTE GOOD MORAL VALUES, REHABILITATION STANDARDS OF UNDERSTANDING, COUNSEL FOR HIGHER ACHIEVEMENTS, BUT THEY DO ATTEMPT TO DESTROY AN INMATES PRISON TICKET



WITH PRISON NEGATIVITY. THE OFFICERS WILL RECEIVE SOME GIFTS FROM INMATES, WHEN THERE'S A PROFIT THAT CAN BE MADE FROM THOSE INMATES. THERE WILL BE OTHER CORRUPTION TO COME OUT IN THE ARRESTMENT AND BRIEF, ALONG WITH AFFIDAVITS TO SUPPORT THE FINDINGS OF FACTS.

(5) OVERCROWDING HAS VERY SUBSTANTIAL IMPACT ON THE INMATES HERE, WHERE INMATES DO MORE TO KEEP DOWN HOSTILITY THAN OFFICERS. SINCE THE MALE OFFICERS ARE SO BUSY TRYING TO ENTERTAIN THE FEMALE OFFICERS AT THIS FACILITY, THEY DON'T HAVE TIME TO TAKE CARE OF THE BASIC NEEDS OF OFFICERS DUTIES. THERE ARE MORE GIRLFRIEND AND BOYFRIEND RELATIONSHIPS, SENIORS, OFFICERS CHASING SEX, FAVORS BEING RENDERED TO EACH OTHER, THERE IS NO TIME FOR THIS PRISON TO FUNCTION PROPERLY. THERE TOO MANY BACK PEOPLE WITH RANK IN THIS FACILITY THAT ARE FRIENDS, THEREFORE, NOTHING WILL EVER BE RIGHT OR FAIR IN THIS FACILITY. AND WHEN THIS FACILITY THINKS THAT YOU CAN OPEN SOME DOORS FOR ASSISTANCE, THEY SEND YOU TO THEIR FRIENDS AT EASTERLINE OR VENTRESS PRISON FACILITY. AND THE WARDEN IS AWARE OF ALL THESE BAD ACTS AND PROCEDURES, AND DOES NOTHING TO PUT HIS PRISON IN ACCORDANCE WITH THE RULES, REGULATIONS, LAWS, AND CONSTITUTIONAL RIGHTS OF THE PRISONERS THAT HE'S RESPONSIBLE FOR.

(b) There's a discrimination problem that exist within this facility, where mental health inmates are given the privilege to gamble, fight, borrow and trade, and not be written up about it. But regular inmates in population are constant written up for these same acts, when this is one prison with one set of rules and regulations for Bullock County Correctional Facility. Inmates in regular population have property taken from them, and passed out to inmates in the mental health section of the prison. Mental health inmates are given playing cards, bingo games, candy, pop-corn, and anything that officers want to bring them, but officers aren't suppose to bring inmates anything according to the rules of this facility. This is a form of discrimination in this prison, and the warden allows other inmates to be written up disciplinarys for these same acts. There will be nothing achieved where this miscarriage of justice continuously takes place, because of the unfairness of these acts to other inmates. If there's going to be a separation of rules and regulations for one set of inmates within this facility, then only one kind of inmates should be allowed to be placed in the confines of this facility.



(7) This Facility has a very discouraging visitation group of officers working the visiting yard, that treats inmates visitors harshly. Visitors are lined up in tightly lined tables pulled together in the gym, and not allowed a chair to be spaced between them. The gym is hot at all times, and is not properly fit for visitors to comfortably visit their family members. The sink in the inmates bathroom has not worked since I've entered this facility, and is very unsanitized. Visitors are made to stand outside the prison under any weather conditions, and some have suffered injury from the extreme heat they've faced. This facility only allows (5) five visitors through the clerk at one time, and has had many complaints against CO-I Edna Johnson for her very harsh attitude against visitors. She is not the only officer with this negative attitude, but the worst of the bunch. Visitors are tax paying citizens, and spend their money in this facility, and should be able to have the proper respect from these disrespectful officers. The warden has been encountered with many complaints about the visitation yard activities, but fails to respond to any request that is sent to his office about these and any other complaints complained about in this facility.

## IN CONCLUSION

SOMETHING NEEDS TO BE DONE ABOUT THE BARBARIC ACTS THAT TAKES PLACE WITHIN THIS FACILITY OF THESE OFFICERS, BECAUSE THEY SEEM TO BE ATTEMPTING TO CREATE PROBLEMS FOR A RIOT. THESE OFFICERS SEEM TO TRY TO PUSH YOU TO THAT LAST LIMIT, AND WRITE IT AS THOUGH AN INMATE CANNOT ADJUST TO THE RULES AND REGULATIONS. I HAVE SPENT OVER (9) NINE-YEARS SERVING TIME, HAD (2) TWO DISCIPLINARIES FROM A MISSISSIPPI STATE PRIVATE PRISON FOR HELPING AN INMATE WITH LEGAL ASSISTANCE, BUT I'VE NEVER SEEN OFFICER'S THIS PERSISTANT IN TRYING TO CREATE A SECURITY HAZARD. THIS HAS GOT TO BE THE WORSE RUN FACILITY IN ALABAMA, WHERE FAMILY AND FRIENDS MAKE SURE EACH OTHER'S BACKS ARE COVERED.

## RELIEF SOUGHT

THERE IS NO MONEY DAMAGES THAT IS SOUGHT IN THIS RELIEF, BUT THAT A FEDERAL INVESTIGATION BE DONE ON THIS FACILITY. AND THAT THIS SOCIAL GROUP OF FAMILY AND FRIENDS BE DISBURST, AND ALL INMATES BE SUBJECTED TO THE SAME RULES AND REGULATIONS AT THIS FACILITY. AND THAT THIS FACILITY BE REQUIRED TO FACILITATE AN OUTSIDE TOILET FOR INMATES ORDERED

OUTSIDE ON THE YARD daily, AND WATER FACETS BE PLACED OUTSIDE FOR THE INMATES. THERE NEEDS TO BE A FEDERAL INVESTIGATION MADE IN THIS PRISON, SO THAT IT CAN BE RUN ACCORDING TO PROPER STANDARDS SET BY THE GOVERNMENT. RELIEVE SOME OF THIS OVERCROWDING SITUATION, BECAUSE VIOLENT MEASURES ARE GOING TO EVENTUALLY BE THE SITUATION THAT OCCURS IN THIS FACILITY.

Done this 1<sup>st</sup> day of AUGUST 2005; Respectfully Submitted,  
Michael D. Anderson  
MICHAEL D. ANDERSON